

REMARKS

In the Office Action, the Examiner rejected claims 1-18 under 35 USC § 103(a). These rejections are fully traversed below.

Claims 1, 4, 5 and 9 have been amended to further clarify the subject matter regarded as the invention. New claims 19-20 have been added to the application.

Claims 1-20 are now pending. Reconsideration of the application is respectfully requested based on the following remarks.

REJECTION OF CLAIMS 1-18 UNDER 35 USC § 103(a)

In the Office Action, the Examiner rejected claims 4 and 9-15 under 35 USC 103(a) as being unpatentable over Schleimer et al., U.S. Patent No. 6,249,787, in view of Panasik et al., U.S. Patent No. 5,987,547; and rejected claims 1-3 and 5-8 under 35 USC 103(a) as being unpatentable over Schleimer et al. in view of Panasik et al. and further in view of Mighdoll et al., U.S. Patent No. 5,987,547. These rejections are fully traversed below.

Schleimer et al. describes the network browsing system that includes a host computer coupled to a client computer by a network. "A server process implemented on the host computer services the request for desired data received from the client computer by modifying the desired data into modified data such that no additional connection between the client computer and the host computer is required to receive the entirety of the modified data." Hence, Schleimer et al. attempts to provide efficient data transfer by not requiring additional connections to receive other embedded components.

On page 3 of the Office Action, with respect to Schleimer et al. the Examiner points to column 11, lines 14-20; and column 6, lines 32-27, column 4, lines 26-37; and Figure 9 as being pertinent. As to column 11, lines 14-20, a step 164 determines whether a locally embedded URL is on the cache list for the client machine. Based on this decision, the URL is appended to the process page if present on the cache list; otherwise, a new HTML object is composed through the recursive process 76'. Accordingly, to the extent any local content at the client machine is being utilized, it is from the cache memory. Further, when the cache memory is utilized, there has been no associated modification of the requested page. Column 6 of Schleimer et al. also pertains to the use of the client machine's cache memory. The advantage of using the cache memory of the

client is that “embedded images or other large files (such as video or audio files) need to be sent from the host machine to the client machine only once, since subsequent references within the same page can be retrieved from the client machine’s cache memory.” Col. 6, lines 27-31.

In contrast, claim 4 pertains to a method for modifying a web page to point to local content on a portable computer readable storage product instead of remote content. Among other things, claim 4 recites: “modifying the web page to direct retrieval of content for the image to be retrieved locally from the portable computer readable storage product instead of from the remote content.” In other words, the method of claim 4 operates to modify a web page so that an image included within the web page can be retrieved locally from a portable computer readable storage product. Hence, the image need not be retrieved from remote content provided over a network. As noted in the present specification, “a portable computer readable storage” is, for example, a CD-ROM, floppy disk, data storage card, or any other portable or semi-portable computer readable medium. In other words, the portable computer readable storage recited in claim 4 does not correspond to a cache memory of a client machine.

In addition, claim 4 has been further clarified to recite: “wherein subsequently the modified web page can be delivered to a requestor’s computer such that the requestor’s computer never needs to receive the high-bandwidth content component over a network connection; instead, the high-bandwidth content component is retrieved locally from the portable computer readable storage product.” Such limitation further distinguishes claim 4 from use of the cache memory as described in Schleimer et al. Indeed, a cache memory by definition acquires the data from a first download and then such data can be locally available so long as it remains in the cache. Schleimer et al. operates in this manner and touts an advantage of using the cache memory of the client is that “embedded images or other large files (such as video or audio files) need to be sent from the host machine to the client machine only once, since subsequent references within the same page can be retrieved from the client machine’s cache memory.” Col. 6, lines 27-31.

Schleimer et al. describes a client computer that includes a cache, see Fig. 1. However, at col. 6, lines 25-38, Schleimer et al. explains that a web browser operates on the client machine and as is typical, images from a web page can be cached so as to provide a web browser cache. In Schleimer et al., the approach is to hopefully download content once and then reuse the content from the web browser cache. In

contrast, claim 4 indicates that some of the content, i.e., high-bandwidth content component(s), are never delivered to the requestor's computer over a network (because such is separately delivered via the portable computer readable storage product).

Thus, Schleimer et al. teaches away from never having to receive the high-bandwidth content over a network connection (e.g., download) yet still receiving the high-bandwidth content locally as recited in claim 4. The Examiner cites Panasik et al. for its removable hard drive 22 for use with a personal computer. Nevertheless, Panasik et al. is not able to overcome the serious deficiencies of Schleimer et al. It is also unclear as to why one skilled in the art would be motivated to combine Panasik et al. with Schleimer et al. Applicants submit that there is no such motivation of record.

Therefore, it is submitted that claim 4 is patentably distinct from Schleimer et al. In addition, it is submitted that claim 9, which recites limitations similar to those recited in claim 4 (although in computer readable medium format), is also patentably distinct from Schleimer et al. in view of Panasik et al.

Claim 1 pertains to a method for modifying a web page to point to local content instead of remote content. Among other things, claim 1 recites: "determining whether the image is supported by an image database that stores images associated with exclusively portable computer readable storage products distributed to users." In addition, claim 1 now recites "wherein subsequently the modified web page can be delivered to a requestor's computer such that the requestor's computer never needs to receive the remote content for the image over a network connection; instead, the local content for the image is retrieved locally from the portable computer readable storage product" (claim 1, lines 11-14).

For reasons noted above, Schleimer et al., alone or in combination with Panasik et al., fail to teach or suggest these features of claim 1.

In Mighdoll, a server functions as a caching proxy on behalf of clients for purposes of accessing the World Wide Web. "The proxying server includes a persistent document database, which stores various attributes of all documents previously retrieved in response to a request from a client. When a Web document is retrieved from a remote server in response to a request from the client, the database is consulted and the stored information relating to the requested document is used by the server in transcoding that document. The document database is also used for prefetching previously requested

documents and images and for reducing latency when downloading images through the client.”

Hence, at best, Mighdoll provides that a server can operate as a caching proxy on behalf of a client to reduce latency when downloading images associated with a document requested by a client. Any caching being provided is not at local machine, but at a server. The server based caching proxy is not a portable computer readable storage product as recited in claim 1. Hence, there is no teaching or suggestion in Mighdoll for use of a portable computer readable storage product that is distributed to users for the purpose of providing local content. Therefore, it is submitted that claim 1 is patentably distinct from Schleimer et al. in combination with Panasik et al. and/or Mighdoll et al.

Claim 5 pertains to a method for modifying a web page to point to local content on a portable computer readable storage product instead of remote content. The processing includes “determining whether the high-bandwidth content is supported by a database that stores high-bandwidth content associated with exclusively portable computer readable storage products to be created; adding the high-bandwidth content to the database when said determining determines that the high-bandwidth content is not yet supported by the database” (claims 5, lines 6-11). Additionally, claim 5 recites “when the exclusively portable computer readable storage products are distributed to users, the high-bandwidth content is already stored to the exclusively portable computer readable storage products” (claim 5, lines 12-15). Accordingly, it is submitted that claim 5 is also patentably distinct from Schleimer et al. in combination with Panasik et al. and/or Mighdoll et al.

Based on the foregoing, it is submitted that claims 1, 4, 5 and 9 are patentably distinct from Schleimer et al. in combination with Panasik et al. and/or Mighdoll. In addition, it is submitted that dependent claims 2, 3, 6, 7, 8, and 10-18 are also patentably distinct from Schleimer et al. in combination with Panasik et al. and/or Mighdoll et al., for at least the same reasons as their corresponding independent claim. The additional limitations recited in the independent claims or the dependent claims are not further discussed as the above-discussed limitations are clearly sufficient to distinguish the claimed invention from Schleimer et al. Thus, it is respectfully requested that the Examiner withdraw the rejection of claims 1-18 under 35 USC § 103(a).

SUMMARY

It is submitted that the claims are not objectionable. In addition, it is submitted that claims 1-18 (as well as new claims 19-20) are patentably distinct from the cited references. Reconsideration of the application and an early Notice of Allowance are earnestly solicited.

If there are any issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 50-0388 (Order No. RCY1P005).

Respectfully submitted,

BEYER WEAVER & THOMAS, LLP



C. Douglass Thomas
Reg. No. 32,947

P.O. Box 70250
Oakland, CA 94612-0250
650-961-8300